# IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT IN AND FOR HILLSBOROUGH COUNTY, FLORIDA

NAVIN PASEM,

Plaintiff, Case No.: 25-CA-002901

v.

JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, and DOES 4 through 200

Defendants.	

# MOTION FOR FINAL JUDGMENT OF DAMAGES

COMES NOW the Plaintiff, Navin Pasem, by and through his undersigned counsel, and requests the court enter a Final Judgment of Damages with respect to the Defendants and their cryptocurrency wallets listed on the attached Schedule 1 and says:

- 1. Plaintiff filed a Complaint alleging grounds for conversion against Defendants.
- Defendants were duly served as provided in that certain Return of Service previously filed in this Case on July 24, 2025.
- 3. To date, Defendants have failed to file any paper in the instant Case as required by this Court's Order Granting Plaintiff's Ex Parte Motion for Reconsideration of Service by Other Means, dated April 21, 2025.

WHEREFORE, Plaintiff asks this court to enter a Final Judgment for Damages against Defendants and the cryptocurrency wallets listed on the attached <u>Schedule 1</u>, jointly and severally, in the amount of \$607,492.00 in compensatory damages, \$250,000.00 in punitive damages, attorney's fees and costs, prejudgment and postjudgment interest, and the imposition of a constructive trust over any assets traceable to the theft alleged in this Case, along with any other relief deemed just and proper by this Court.

Respectfully submitted this July 31, 2025.

/s/ Navin R. Pasem

Law Office of Navin R. Pasem, P.L.

Navin R. Pasem, Esq. Florida Bar No. 18863 5401 W. Kennedy Blvd, #100 Tampa, Florida 33609

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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing motion has been filed with the Clerk of this Court via the Florida Courts eFiling Portal and furnished on July 31, 2025 to Defendants via the method of service previously approved by this Court for service.

/s/ Navin R. Pasem Attorney

### **SCHEDULE 1**

### Coinbase (3)

0x8495D0D64835bBbcA933501488483f83184AEE04 0x829f8Dc756f7bfe0fa93c4A4A349A248Abf3FBf9 0xD141b2a341B66Ba3FC98a83204bB3c13FA3979D0

#### OKX (2)

0x946A6903512eD5C758Ff29674CE2D80Ab3acf8D1 0xb96029D98301ebda17189dF57666A06019FC0f42

#### TradeOgre (4)

0x4648451b5F87FF8F0F7D622bD40574bb97E25980 bc1qnru0urp778ju4v3datvrhhwh7v772shpkajk89 bc1qmp6kgcmtzl944slcyp5dprx3vjggk20nuk2j43 bc1qhxmay86etyg9nzykgcsm2wjt7ccul4wmnhsyg8

#### Binance (4)

0x56957739BAe1b7C0725f4e517309eFC8EF6EB73e 0x615790F841d626688Bbc7C397a1dC15785487996 0x08E163449a1951c560c4c93E6638c346633aA56D 15fJm7DahbW5vF71ns8UXdx74ZPCGPXv4N

#### KuCoin (1)

0x5021aF4f24c5Bd4Cb7c1CCF8eCc198664414A326

#### HTX (1)

1JaUhzMuXo3Xuvn5p67LNzmLhXnPu32FZn

#### WirexApp (1)

0x8b4A8493fDcD038e04E5fd6AE6A93b3a53c8967a

## HitBTC (3)

0x52103366eB89a5f8c833c34B77892Ef90521C167 0x187fE1a8B76c60b85c00A2819152ff00Ff642386 0x32E2EeF43D74601a0eB52eA71c142A6f432F1924

#### ChangeNow (3)

0xfAaEf33462e2256cfeF3F96C7347Dd7e3C175F09 0xc9148Db23F4217fb320113724946D97bD373eCba 0xdA01f89Bce7E66BCe7a523E0F11A3a9a21Aa68f0

#### CoinEx (2)

0x7086ac523208cc53619Dc63dC7F47E8fb316D057 0x4C6324ebB5B438cfEcf0f878c776574FEeDE4F36

#### OxaPay (1)

0xC842355888f47C9E4F0eBEF7627A66724Be01295

# Stake.com (1)

0x993Cd9D9eb1647eAD826C7F7bC8277E5227c2218

## CoinPal (3)

0xAe2b3879ede4732FfD6942be25Ff796B31d67749 0x1472924b0325a37A71E71519ffaF765dc9D27cea 0x429d947cFDD87e4cb1ca3eBDa9075C6B4E801B9a

# Uphold (1)

0x06a909c7ED913a8c3b613A4B2a5168Ca579b515c